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October 25, 2021

Hon. John Michael Vazquez  
United States District Judge for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Hon. Edward S. Kiel  
United States Magistrate Judge for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Helen Natsis and Konstantinos Natsis v. Turner, et al.*,  
Civil Action No. 2:13-cv-7269 (JMV) (ESK)**

Dear Judges Vazquez and Kiel:

This firm represents the Weehawken Defendants in connection with the above matter. Kindly accept this letter in response to that from Plaintiffs' newly retained counsel, Dominick Minervini, Esq., objecting to Plaintiffs' request for an adjournment of the Pre-Trial Conference scheduled for November 2, 2021.

The parties received notice of the Pre-Trial Conference on September 16, 2021. Thereafter, the undersigned spoke with Jason Rindosh, Esq. on September 22, 2021, and he advised he would submit his portion of the Order to counsel ahead of the conference for completion and submission to the Court. Defendants intended to do the same. Mr. Rindosh provided no indication that new counsel would be retained. In fact, the first notice Defendants had of new counsel for Plaintiffs came via a court submission on October 19, 2021, almost one month later. Notwithstanding, the retention of new counsel and the present request to adjourn the conference is a ploy to delay this case which has been pending since December 3, 2013.

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While we are sympathetic to death of Helen Natsis, such should have no impact on the continued litigation of this matter. While counsel indicates there are many issues which warrant an adjournment, Defendants disagree. For instance, the location of Mrs. Natsis's files have no bearing on the conference whatsoever. Plaintiffs' have been represented by counsel since at least 2016. Discovery has been exchanged by the parties. The information to be imputed into the Order must come from those materials and not what is contained in Mrs. Natsis's files. While there are various docket entries, what is at issue with the Third Amended Complaint and the remaining claims based upon the decision of the Court on summary judgment.

Not only was it Plaintiffs' decision to retain new counsel on the eve of the Pre-Trial conference, but counsel agreed to be retained with full knowledge that this case was at the trial stage and included voluminous discovery. Defendants should not be prejudiced by this decision. This matter has been ongoing long enough and Defendants would like to see a resolution.

Respectfully submitted,

/s/Tracy Bussel

TRACY B. BUSSEL

/s/Elise DiNardo

ELISE DINARDO

TBB:tbb  
cc: All Counsel of Record